



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northeast Fisheries Science Center
166 Water Street
Woods Hole, MA 02543-1026

May 23, 2002

175201

U. S. Coast Guard
Docket Mgt. Facility (USCG-2001010486)-15
U. S. Dept. Of Transportation
Room PL-401
400 Seventh St., SW
Washington, D.C. 20590-0001

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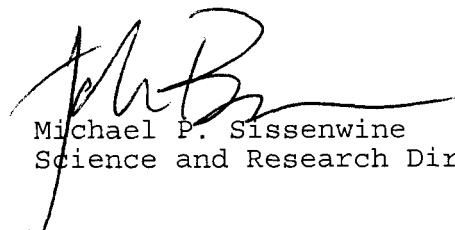
Gentlemen:

With reference to our memo dated April 11, 2002, regarding Standard for Living Organisms in Ship's Ballast Water Discharged in U.S. Waters, 33 CFR Part 151 (Federal Register, Vol. 67, No. 42, 4 March 2002) the following are additional comments:

The Northeast Fisheries Science Center (NEFSC) acknowledges that the threat of invasive species is a serious one and that ballast water from ships presents a significant vehicle for introduction. The NEFSC provided comments on the Standard for Living Organisms in Ship's Ballast Water Discharged in U.S. Waters, 33 CFR Part 151 (Federal Register, Vol. 67, No. 42, 4 March 2002) in a letter sent to the U.S. Coast Guard on 11 April 2002. In response to comments to our letter, we herewith submit this supplemental letter.

We acknowledge that the common perception that long established shipping routes have likely reached or are approaching a peak regarding possible introductions of xenobiotics is likely wrong. This topic was addressed in a 1996 paper (J. T. Carlton, 1996. Pattern, process, and prediction in marine invasion ecology. Biological Conservation 78: 97-106), which posed five hypotheses for why invasions continue to occur along historically established routes. Scenarios include changes in the donor region, changes in the recipient region (for example, Long Island Sound and other coastal embayments shift environmentally over time, and become either more susceptible or more resistant to invasions by certain taxa), changes in the dispersal vector (for example, larger ships with more ballast water traveling faster, thus improving survival time of species), and so forth. Therefore, we support the position that relaxing efforts to control invasive species in ballast water from ships on historically established routes is not a recommended option.

Sincerely,



Michael P. Sissenwine
Science and Research Director

c: T. Noji

